



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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February 19, 2025

**BY ECF**

Hon. John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Peterec-Tolino v. Pennrose LLC, et al.*, 24 cv 06911 (JGK)

Dear Judge Koeltl,

I represent the municipal Defendants in the above referenced matter. I write to request an adjournment of the response deadlines currently set for March 7, 2025. ECF Document No. 22. On February 14, 2025, Plaintiff filed an Amended Complaint joining the United States Fish and Wildlife Service as an additional Defendant to this lawsuit. In light of the United States being added as a Defendant, judicial economy would best be served by allowing the Plaintiff to serve the complaint on the added Defendant, for the parties to have an opportunity to confer, and for the court to set a coordinated briefing schedule with the participation of all parties. Thus, we respectfully request that the Court adjourn the response deadline, with new dates to be set once the United States has appeared in the case. All Defendants who have already appeared join in this request.

Thank you for your consideration of this matter.

Respectfully submitted,

*Derek D. Segars*

Derek Segars  
Assistant Corporation Counsel

cc: John Peterec-Tolino  
(via regular mail and email)

All counsel of record  
(via ECF)